

MICHAEL J. HADDAD (SBN 189114)  
JULIA SHERWIN (SBN 189268)  
BRIAN HAWKINSON (SBN 341856)  
HADDAD & SHERWIN LLP  
505 Seventeenth Street  
Oakland, CA 94612  
Telephone: (510) 452-5500  
Facsimile: (510) 452-5510

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

THOMAS BARBOSA, DECEASED, by and  
through his Co-Successors in Interest, LUPITA  
BARBOSA, Individually, and as mother and Next  
Friend for K.B. and T.B., minors; ANGELICA  
MARTINEZ-VERA, individually; and KATHLEEN  
HOOD, individually,

Plaintiffs,

vs.

SHASTA COUNTY, a public entity; SHASTA  
COUNTY SHERIFF'S SERGEANT JOSE  
GONZALEZ, in his individual capacity; SHASTA  
COUNTY SHERIFF'S DEPUTY THOMAS  
FLEMING, in his individual capacity, jointly and  
severally,

Defendants.

Case No. 2:20-cv-02298-JAM-DMC

**STIPULATION AND ORDER TO  
REPLACE TRUSTEE**

1. The current Trustee for the T.B. and K.B. Trusts, Ryan de la Fuente of CSC Fiduciaries, Inc., submitted a letter of resignation on May 23, 2025, as well as conditional resignations and consents to her replacement. Plaintiffs' counsel has assisted T.B. and K.B.'s mother and Next Friend, Lupita Martinez Barbosa, in conducting a thorough search for a replacement Trustee.

2. Plaintiffs' counsel and Ms. Martinez Barbosa would like to replace Ms. de la Fuente with Crystal Coats, a Trustee in Chico, California, who was recommended by Westamerica Bank Trust Services in Sacramento, California. The assets in the children's Trusts are too small for Westamerica Bank to manage; but their Trustee is handling two trusts for Plaintiffs' counsel's other clients, and recommended Ms. Coats.

3. Plaintiffs' counsel will advise the new Trustee as needed on a *pro bono* (without attorneys' fees) basis, to ensure all funds are used for T.B. and K.B.'s benefit and in the children's best interests.

4. All parties involved in the Trust agree they shall complete and execute all necessary documents for transfer of the Trust and all Trust assets to management by Ms. Coats.

5. The new Trustee agrees to provide the quarterly reports and annual accountings to Ms. Martinez Barbosa and her sister, Maria Perez, required by this Court's March 14, 2024, Order Approving Minors' Compromise. (ECF No. 93).

STIPULATED AND AGREED.

Dated: 05/29/25

HADDAD & SHERWIN LLP

/s/ Julia Sherwin

\_\_\_\_\_  
Julia Sherwin  
Attorneys for Plaintiffs

Dated: 05/28/25

CRYSTAL A. COATS, FIDUCIARY

/s/ Crystal A. Coats

\_\_\_\_\_  
Crystal A. Coats  
Professional Fiduciary

1 Pursuant to stipulation of the parties, and for good cause,

2 IT IS SO ORDERED.

3 Ryan De La Fuente and CSC Fiduciaries, Inc. are immediately replaced as Trustees for T.B.  
4 and K.B. by Crystal A. Coats. In addition, Ms. De La Fuente shall, within 7 days of entry of the  
5 Order, provide to Plaintiffs' counsel, Lupita Martinez Barbosa, and Maria Perez all documents  
6 related to the Trusts for T.B. and K.B., including all statements, all invoices paid, copies of all  
7 checks written, and all documents submitted to any entity or person to change the Trust Fiduciary to  
8 Ms. De La Fuente in her own capacity, instead of as an employee of CSC Fiduciaries, Inc.

9 Dated: June 04, 2025

/s/ John A. Mendez

10 THE HONORABLE JOHN A. MENDEZ  
11 SENIOR UNITED STATES DISTRICT JUDGE  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28